

# PUBLIC SUBMISSION

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Draft Chesapeake Bay Total Maximum Daily Load

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Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

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Comment submitted by Peter McDonough, Virginia Golf Council

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## Submitter Information

**Submitter's Representative:** Peter McDonough  
**Organization:** Virginia Golf Council

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## General Comment

My name is Peter McDonough and I am a board member of the Virginia Golf Council representing the golf industry in Virginia, and we are committed to environmental stewardship. Clean water and good soil are fundamental to our business. Golf courses in Virginia present many opportunities for diverse wildlife habitats and environmental enhancements. We have been doing our part and will continue to do so in order to help create a healthy Chesapeake Bay and local waters. Below are some points I wish to make for your consideration.

- According to the Virginia Department of Agriculture and Consumer Services, only 1.2% of all nitrogen fertilizer sold in Virginia is for non-farm use. Despite the very low amount of nitrogen sold for non-use, turfgrass is treated in the Bay TMDL as a major contributor to nitrogen runoff into the Bay. Science does not justify that claim.

- University studies have shown that turfgrass, when maintained properly, serves as an excellent filter for stormwater runoff, can be a carbon sink, and captures sediment.

- Without regulatory pressure, the turfgrass/green industry requested that the state create an Urban Nutrient Management Program so that their professionals can have plans specifically tailored for their businesses.

Virginia's golf industry is developing a Best Management manual covering environmental concepts and monitoring, irrigation, design and construction, pesticide management, water quality and water supply issues for the industry to implement.

- The Chesapeake Bay Model, the basis for nutrient and sediment reductions required by EPA, has been shown to have extensive flaws in the data it utilizes. EPA even acknowledges this fact. EPA should not move ahead with costly mandates based upon flawed modeling and data.

- EPA's federal backstops requiring more unregulated lands to meet MS-4 requirements may cause significant economic hardship for urban landowners, including the green and turfgrass industries. Please do what is right!